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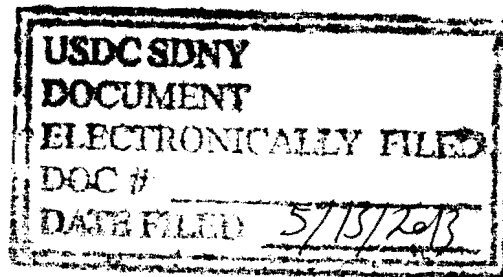
**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE AUTOHOP LITIGATION

MASTER FILE
12 Civ. 4155 (LTS)(KNF)

This Document Relates To:

All Actions



**AMENDMENT TO JOINT ELECTRONIC DISCOVERY
SUBMISSION NO. 1 AND ~~PROPOSED~~ ORDER**

The Parties previously agreed in Section (6)(c) of the Joint Electronic Submission No. 1, filed on December 7, 2012 (ECF No. 160), "to continue to meet and confer concerning the technical specifications for form of production, including the extracted data fields to be produced and other technical parameters of production." Having met-and-conferred and having reached agreement on the technical specifications for form of production, Plaintiff/Counterclaim Defendant DISH Network L.L.C., Counterclaim Defendant DISH Network Corporation, Counterclaim Defendant EchoStar Technologies, L.L.C. (together, "DISH Parties"), Defendant/Counterclaimant American Broadcasting Companies, Inc., Defendant/Counterclaimant ABC, Inc., Defendant/Counterclaimant Disney Enterprises, Inc. (together, "ABC Parties"), Defendant/Counterclaimant CBS Corporation, Counterclaimant CBS Broadcasting Inc., Counterclaimant CBS Studios Inc., and Counterclaimant Survivor

Productions L.L.C. (together, “CBS Parties”) hereby submit this amendment to Section (6)(c) of the Joint Electronic Submission No. 1 and Order, to read as follows:

(c) Form of Production

The Parties have reached the following agreements regarding the forms of production:

A producing party may de-duplicate its production across the entire production, or by Custodian, at its discretion. Any party conducting a global de-duplication must produce a field in the load file identifying every custodian who had a copy of the de-duplicated file. This field shall be called the “Duplicate Custodian” field.

All electronically stored information shall be produced in single page Group IV TIFF format, with a minimum resolution of 300 dpi. For each document, a text file shall be provided with the TIFF image. The text of each document (with the exception of redacted documents) shall be extracted directly from the native file into document level .txt files.

If a producing party is unable to extract text or has applied a redaction treatment to a document, the producing party shall produce the electronically stored information with optical character recognition (“OCR”) treatment, where reasonable (e.g., OCR not needed for gifs). If a document cannot be imaged, a placeholder Bates stamped image will stand in for that document, and the agreed-upon metadata will be provided for that placeholder in the applicable load file(s).

All documents displaying track changes should be imaged with the “redline” displayed. PowerPoint slides should be imaged with the attached speaker notes. If, after production of responsive electronically stored information in TIFF format, a receiving party determines that certain electronically stored information is not usable in TIFF format (e.g., a lengthy Excel spreadsheet), the receiving party reserves the right to request that the Parties meet and confer on whether select electronically stored information should be reproduced in native format.

A document “family” is deemed to be the compound unit of (i) an e-mail and all of its attachments; or (ii) a loose file and any files embedded therein. The contents of a loose zip file shall be treated as a collection of families within a single container, and not as one document family with the container file as the parent document.

E-mail messages shall be produced with the following extracted data fields:

- BATES BEGIN
- BATES END
- FAMILY BEGIN, or in the alternative, ATTACHMENT BEGIN (ATTACHID for each attachment)
- FAMILY END, or in the alternative, ATTACHMENT END (for each attachment)
- DOCUMENT TYPE
- DATE SENT
- DATE RECEIVED
- TIME SENT
- TIME RECEIVED
- PARENT DATE
- SUBJECT
- TO
- SENDER
- CC
- BCC
- CUSTODIAN
- DUPLICATE CUSTODIAN
- REDACTED (Y/N)

Loose files and attachments to e-mails shall be produced with the following extracted data fields:

- BATES BEGIN
- BATES END
- FAMILY BEGIN or, in the alternative, PARENT BEGIN (PARENTID) or, in the alternative, ATTACHMENT FAMILY ID
- FAMILY END, or, in the alternative, PARENT END or, in the alternative, ATTACHMENT FAMILY ID
- DOCUMENT TYPE
- AUTHOR
- FILENAME
- TITLE
- DATE CREATED

- DATE LAST MODIFIED
- PARENT DATE
- TEXT
- CUSTODIAN
- DUPLICATE CUSTODIAN
- REDACTED (Y/N)

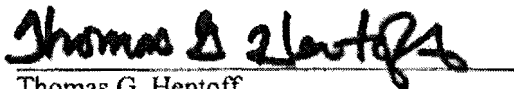
In addition to the foregoing, the Parties agree to the following parameters:

- Metadata:
 - Volume.DAT using Concordance delimiters
- Images:
 - Single page Group IV TIFFs
 - OPT load file
 - LFP load file
- Text:
 - Document level text files
 - LST load file or, in the alternative, DAT load file containing a path to the text files
- Natives:
 - Native link in DAT file if these are provided
- Volume build may take one of the following two forms:
 - EITHER: VOLUME Name
 - Images- Folder to contain all images
 - FullText- Folder to contain all document level text files
 - Natives- Folder to contain all produced natives named after BegDoc
 - Load File- Folder to contain LST, DAT, OPT and LFP load files
 - OR: VOLUME Name
 - Load file DAT
 - Load file OPT, LFP
 - Folder containing relevant data:
 - Natives: folder to contain native files
 - Images_Text: folder to contain images and text files (image and text files reside in the same folder)

Consistent with Section (6)(a) of Joint Electronic Discovery Submission No. 1, the Parties will not be required to search for (i) “deleted,” “slack,” “fragmented,” or “unallocated” data on hard drives, including random access memory (RAM); (ii) other ephemeral data and on-line access data such as temporary internet files, history, cache, cookies, etc.; (iii) data in

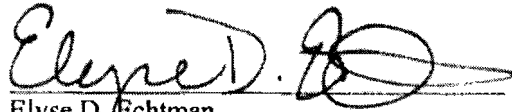
metadata fields that are frequently updated automatically, such as last-opened dates; (iv) backup data that is substantially duplicative of data that is more accessible elsewhere; and (v) other forms of ESI whose preservation requires extraordinary affirmative measures that are not utilized in the ordinary course of business.

Respectfully submitted,



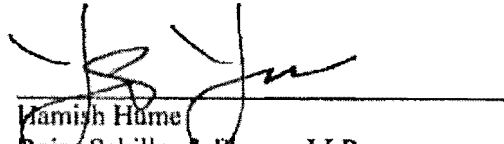
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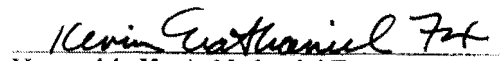


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Dated: May 9, 2013

SO ORDERED:



Honorable Kevin Nathaniel Fox
United States Magistrate Judge
Southern District of New York

Dated: 5/13/13